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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

ORIGINAL
FILE

November 6, 1992

Donna R. Searcy
Secretary
Federal Communications Commission
Washington, D.C. 20554

RE: GC Docket No. 92-223

Dear Ms. Searcy:

On behalf of the Pacifica Foundation, the National Federation of Community Broadcasters, American Public Radio, the Intercollegiate Broadcasting System, the National Association of College Broadcasters and PEN American Center, I hereby transmit the original and four copies of their Comments in response to the above-captioned rule making.

No filing fee is required with this submission.

Kindly communicate any questions directly to this office.

Yours very truly,



John Crigler

JC/an

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Before The
Federal Communications Commission
Washington, D.C. 20554

In The Matter Of

Enforcement of Prohibitions
Against Broadcast Indecency in
18 U.S.C. 1464

GC Docket No. 92-223

TO: The Commission

COMMENTS IN OPPOSITION TO PROPOSED INDECENCY BAN

The Pacifica Foundation(Pacifica), the National Federation of Community Broadcasters (NFCB), American Public Radio (APR), the Intercollegiate Broadcasting System (IBS), the National Association of College Broadcasters (NACB), and PEN American Center (PEN) hereby submit their comments in response to the Notice of Proposed Rule Making, FCC 92-445 (released October 5, 1992).

I. THE COMMENTERS

Pacifica is a non-profit corporation organized in 1946. The purposes outlined in its charter include: "to encourage and provide outlets for the creative skills and energies of the community" and "to promote the full distribution of public information." Pacifica operates six noncommercial educational FM radio stations; the Pacifica Radio News, an international news service; the Pacifica Program Service, which distributes radio programming across the nation; and the Pacifica Radio Archive, which houses a collection of

over 30,000 recordings of Pacifica programs which Pacifica makes available to public broadcast stations, scholars and the general public.

NFCB is a non-profit corporation founded in 1973 to represent the interests of “community” radio stations. These are noncommercial educational FM stations which provide a locally oriented program service, largely through volunteers drawn from their service area. NFCB represents 62 member stations and 115 affiliate stations.

American Public Radio (APR), a non-profit corporation, is a nationwide public radio network with 438 affiliate stations with a weekly listening audience of almost 14 million people. APR distributes nearly 200 hours of programming weekly, which makes it one of the largest distributors of radio programming in the country. It develops, funds, acquires and distributes programming from more than 50 station-based, independent and international producers.

IBS is a nationwide, non-profit association of some 600 college radio stations. IBS member stations are operated by students, community volunteers, and professionals.

NACB is a national, non-profit trade association of over 550 members. Its members are primarily college and school radio and television, broadcast and cable outlets.

PEN is a nonpartisan, nonprofit organization of over 2,100 writers. It is affiliated with International P.E.N., a worldwide association of poets, playwrights, essayists, editors, and novelists. The International P.E.N. charter states that “PEN stands for unhampered transmission of thought within each nation and between all nations, and members pledge themselves to oppose any form of suppression of freedom of expression in the country and community to which they belong.”

II. INTRODUCTION

In April 1987, the Commission issued a Public Notice and rulings with respect to broadcasts carried on Pacifica station KPFK, Los Angeles, California, one other noncommercial educational (NCE) FM stations, and one commercial FM station *In Re Infinity Broadcasting Corp. of Pennsylvania*, 2 FCC Rcd 2705 (1987); *In Re Pacifica Foundation, Inc.*, 2 FCC Rcd 2698 (1987); *In Re Regents of the University of California*, 2 FCC Rcd 2703 (1987). (Collectively, the *KPFK Decisions*) The *KPFK Decisions* jettisoned long-standing Commission's policy with respect to the broadcast of "indecent" broadcast material, [*FCC v. Pacifica Foundation*, 438 U.S. 726, 98 S. CT. 3026, 57 L.Ed.2d 1073 (1978), to *Pacifica Foundation*], adopted a "generic" definition of indecent material, and announced that the generic definition would be enforced whenever there was a reasonable risk that children would be in the audience. *New Indecency Enforcement Standards to be Applied to All Broadcast and Amateur Radio Licensees*, 2 FCC Rcd 2726 (1987) ("*Public Notice*").

The indecency standard has remained in flux since that time. In an order reconsidering its April, 1987 Public Notice, *In Re Infinity Broadcasting Corp. of Pennsylvania*, 3 FCC Rcd 930 (1987) ("*Reconsideration Order*"), the Commission refused to allow broadcasters leeway to make reasonable, good faith judgments as to what was indecent. Broadcasters would be strictly liable for weighing a "host of variables" that made up the "context" of the material. *Reconsideration Order*, 3 FCC Rcd at 932. Variables which the broadcaster had to weigh included the "vulgar" or "shocking" nature of the language or imagery at issue, the "manner" of presentation, a consideration of whether the material in question was isolated or fleeting, and the merit of a work. Lest the last factor be taken as an encouragement to air works of merit, the Commission hastened to add that merit was simply one of many variables, and that it was entitled to

no greater weight or respect than any other variable. *Reconsideration Order*, 3 FCC Rcd at 932. If the broadcaster made a good faith error in judgment, that fact would be considered only in determining the penalty to be imposed. *Reconsideration Order*, 3 FCC Rcd at 933.

The *Reconsideration Order* also modified the Commission's earlier decision to decide on a case-by-case basis the question of when a broadcast would present a "reasonable risk to children." Conceding that such a standard amounted to an "effective ban" on protected speech, the Commission announced that "12:00 midnight is our current thinking as to when it is reasonable to expect that it is late enough to ensure that the risk of children in the audience is minimized and to rely on parents to exercise increased supervision over whatever children remain in the viewing and listening audience."

Reconsideration Order 3 FCC Rcd at 934, 937 n.47.

The Commission's indecency standard was reviewed and invalidated in part by the Court of Appeals for the District of Columbia Circuit. *Action for Children Television v. FCC*, 852 F.2d 1332 (D.C. Cir. 1988) ("*Act I*"). Although the court found itself "impelled" to affirm the "less than precise" definition of indecency, 852 F.2d at 1341, it struck down the midnight "safe harbor" as arbitrary and capricious. The court held that:

Broadcast material that is indecent but not obscene is protected by the first amendment; the FCC may regulate such material only with a due respect for the high value our Constitution places on freedom and choice in what people say and hear.

852 F.2d at 1344.

The Court found that in imposing a midnight ban the Commission not only failed to explain how the proposed safe harbor would achieve the government's interest of helping parents supervise their children's listening,

852 F.2d at 1341-1342, but failed to explain what constituted a “reasonable risk” to children. In particular, the court noted that the Commission had not examined the question of whether children were actually listening to the stations accused of broadcasting indecent material:

In Santa Barbara [community of license for one of the NCE stations which were the subject of the *KPFFK Decisions*]... the FCC’s concern amounts to, at most, 4.3 percent of the age group population. The Commission published no reason why it determined that the potential exposure of four percent of all children amounts to a “reasonable risk” for channeling purposes.

852 F.2d at 1342.

Despite these admonitions from the court, the Commission on remand declined to accept “individual station data” on grounds that “such data are unnecessary to determine children’s listening and viewing habits and do not reflect the prevalence of random tuning.” *In Re Enforcement of Prohibitions Against Broadcast Indecency*, 4 FCC Rcd 8358 at 8361, 8366 n.30 (1989). Indeed, the Commission declined to comply with the court’s mandate that the Commission identify some reasonable period of time during which indecent material may be broadcast, and on instructions from Congress, implemented a total ban on the broadcast of indecent material.

The ban was struck down in *Action for Children’s Television v. FCC*, 932 F.2d 1504 (D.C. Cir. 1991) (“*Act II*”), and the court again ordered the Commission to conduct a “full and fair hearing” to determine the times at which indecent material may be broadcast, 932 F.2d at 1510. As part of this inquiry, the court instructed the Commission to consider the appropriate definition of children, what constituted a “reasonable risk” of exposing children to indecent material, station and program-specific audience data expressed as a percentage of the relevant age group population, and the scope of the government’s interest

in regulating indecent broadcasts. 932 F.2d at 1510. The present NPRM must be responsive to those instructions.

III. LISTENERS DO NOT CHOOSE RADIO PROGRAMS RANDOMLY

In the comments which were submitted in the first phase of this inquiry, the Commenters challenged the Commission's theory that radio listeners were mindless "grazers" who relied upon random tuning to select the broadcast material to which they listened. Citing *Audience 88: a Comprehensive Analysis of Public Radio Listeners*, a study of public radio commissioned by the Corporation for Public Broadcasting, the Commenters submitted data which demonstrated that public radio, as a medium, attracted and served an audience which was not only demographically and psychographically distinct, but distinct in the way in which it used radio. The Commenters showed that the audience for public radio was overwhelmingly an adult audience. Teen listening to public radio accounted for a mere 0.2 % share of teen listening and constituted virtually a zero share of total radio listening.

The Commenters take this opportunity to update their earlier comments. The update consists of additional discussion as to fundamental defects in the indecency standard and additional factual information as to the nature and extent of radio listening by children. Attached as Exhibit A is the Statement of David Giovannoni Regarding Children's Listening to Public Radio. The Statement presents data showing how children use radio. The central finding of that study is that children use radio differently than adults, and only gradually learn to use radio as a medium. In fact, young children (persons 0-8) do not, for the most part, use radio. Access is primarily a secondary experience. The child hears radio selections chosen by others. Pre-teens (persons 8-11), even when

given independent access to radio, generally prefer other media, such as television, or other forms of audio entertainment, such as pre-recorded audio cassettes or CDs.

Although teens begin to use radio as a medium, their use of radio lags far behind that of adults. As a group, teens listen to approximately one-third (32%) less radio than any other age group. The weekly “cume” for teen listening to public radio is less than five percent. This means that fewer than one in twenty teens tune in to a public radio station for five minutes or more per week.

Time spent listening is low even among the teens who listen to public radio. Teens who listen to public radio listen an average of only four hours per week. By age 18-24, time spent listening increases by over 30 percent. By age 25-34, time spent listening has increased by 73%. By age 35-44, time spent listening has doubled. As these data clearly indicate, the appeal of public radio increases with the age of the listener, and is strongest for persons who are at least 25 years old.

In *Act I*, the court observed that the Commission in establishing a midnight safer harbor had offered no explanation as to why the potential risk of exposing four percent of a particular age group to constitutionally protected speech constitutes a “reasonable risk.” The Commission has still offered no such explanation. Nor has it shown why a medium which is oriented to a predominantly adult audience should be reduced to the age level of those who do not listen and are not likely to likely to listen until their adult years.

IV. MERITORIOUS PROGRAMS SHOULD NOT BE BANNED

As the following two concrete examples illustrate, the proposed NPRM would take a heavy toll on programs of outstanding quality.

1. *Seoul to Soul*

In August 1992, in the wake of the Rodney King verdict and the ensuing violence, Pacifica's Los Angeles Station KPFK broadcast a series of programs dealing with the questions "What happened in Los Angeles and why? What does the future hold?" One of these programs, titled *Seoul to Soul*, was broadcast on August 8, 1992 from 10:00 p.m. until midnight. The program was described as "a gathering of artists from Korean and African-American communities who come together to present poetry and performance art."

The program was hosted by Steve Park, a regular cast member of the popular Fox television series, "In Living Color," with extensive stage appearances with The Pan Asian Repertory Theatre in New York. Nine other poets, playwrights, and performing artists took part in the event. Among these were Wanda Coleman, whose most recent books include *A War of Eyes and Other Stories* and *African Sleeping Sickness*; Nat Jones who began his acting career at the age of three on the Ed Sullivan show and who has appeared on Broadway, television and film with such performers as Bette Davis, James Earl Jones, and Cicely Tyson; Ko Won, whose publications include nine volumes of Korean poetry and two volumes of Korean essays; and Chungmi Kim author of *Chungmi- Selected Poems* and the award winning screenplay, *The Dandelion*. The performances passionately dramatized personal and racial issues facing minorities, immigrants, women and homosexuals.

Because the program contained references to "sexual and excretory activities and organs," it was, despite its obvious literary and cultural significance, potentially "indecent." Pacifica therefore "channeled" the program to the late evening hours, introduced the program with an advisory that the program contained sensitive language, and urged listeners who might be

offended by such language, or who might wish to prevent young children from hearing adult material, to tune out for a two hour period. No listener complaints were received.

2. The Miles Davis Radio Project

In May, 1991, American Public Radio re-released *The Miles Davis Radio Project* in honor of Miles Davis' 65th birthday. The program consisted of six one-hour shows and a two-hour concert, and featured interviews, rare studio outtakes, and commentary by musicians and musical historians. The program aired on over 200 noncommercial FM stations in the United States and in 27 of the top 30 markets. It was the second most popular program ever distributed by APR.

The program included such distinguished performers as Danny Glover, Quincy Jones, Roberta Flack, Joni Mitchell, Carlos Santana, members of Earth, Wind & Fire and the Grateful Dead. It traced Miles Davis' musical development and impact on the modern music world and examined the social and economic influences of his time. In addition to brilliant musical performances, the series contained a rich picture of the African-American music world and the development of jazz since 1946.

Funded by the Corporation for Public Broadcasting, the National Endowment for the Arts, the Pennsylvania Council on the Arts and the William Penn Fund, *The Miles Davis Radio Project* received a Peabody Award, one of the most prestigious awards in broadcasting. The Peabody Committee described the series as a "milestone in radio biography."

The program was distributed with a detailed language advisory which advised stations that the program contained sexual and excretory words and phrases "which some may consider offensive."

Adoption of the proposed NPRM would place a cloud over programs such as *Seoul to Soul* and the *Miles Davis Radio Project*. The proposed safe harbor period would give broadcasters three options: to air such programs before the safe harbor period and risk Commission action; to broadcast the programs during the proposed safe harbor period when few listeners are awake; or not to air the programs at all. Each of these alternatives works to prevent adult listeners from obtaining access to programming of the highest quality.

V. THE PROPOSED INDECENCY POLICY IS UNTENABLE

Unlike tradition legal concepts, which become clearer and more meaningful as they are applied, the Commission's indecency policy has become less intelligible with successive rulings. On October 27, 1992, the Commission issued a notice of apparent liability for \$105,000, the largest forfeiture ever issued for a violation of the Commission's indecency policy. *Letter to Greater Los Angeles Radio, Inc.*, FCC-92-481, released October 27, 1992. The forfeiture letter is devoid of analysis of the criteria the Commission applied in deciding that the program material in question was indecent. The sum of its discussion of the substantive standard is: "We believe that the subject excerpts ... are indecent in that they contain language that describes sexual and excretory activities and organs in patently offensive terms." Such a ruling is of no value to broadcasters and program producers who are trying to understand and comply with the Commission's standard. The ruling amounts to a finding that material is indecent when the Commission says it is.

Although the Commenters express no view as to the merits of this or other particular cases, they find the Commission's lack of analysis on such a complex subject regrettable. The Commenters urge the Commission to take this

occasion to revisit and clarify its indecency policy, particularly in the areas discussed below.

A. THE BROADCASTER'S GOOD FAITH JUDGMENT

Indecent material is currently defined as material that “depicts or describes, in terms patently offensive as measured by contemporary standards for the broadcast medium, sexual or excretory activities or organs.” *Public Notice*, 2 FCC Rcd at 2726 (1987). The meaning and scope of this definition are not self-evident. Commenters urge the Commission to recognize the imprecision inherent in this definition by acknowledging the role that the broadcaster’s good faith judgment must play in deciding whether material is or is not indecent. No indecency forfeiture should be imposed in circumstances where the broadcaster has made a reasonable, good faith judgment that the material broadcast was not indecent.

Recognition of the role of good faith judgment would be consistent with the Commission’s recent ruling that such judgments are a legitimate part of deciding whether political programs are indecent. In its October 30, 1992 *Letter to Mr. Daniel Becker*, DA 92-1503, the Chief, Mass Media Bureau, held that, despite the Communications Act’s mandate that broadcasters give reasonable access to federal candidates, broadcasters could channel to the safe harbor period a political program which the broadcaster “in good faith believes is indecent.” There is no basis for allowing broadcasters to make such judgments with respect to political programs and not with respect to other programs.

B. CONTEMPORARY COMMUNITY STANDARDS

In its *Reconsideration Order*, the Commission held that “indecency will be judged by the standard of an average broadcast viewer or listener.” *Reconsideration Order* at Paragraph 24. A national standard based upon what the Commissioners believe would offend a hypothetical “average” person is an

opaque and virtually unknowable standard. Such a standard negates the broadcaster's ongoing efforts to ascertain needs and interests of its community. Broadcasters can discover what will offend the average listener or viewer only by studying Commission rulings. If these rulings are devoid of discussion of the standards applied, the broadcaster is left to guess at the Commissioners' "current thinking."

Decisions as to what may and may not be broadcast should not be left to guesswork, particularly when the penalty for guessing wrong may be loss of a broadcast license and forfeitures of more than \$100,000. The Commenters therefore urge the Commission to permit programmers and broadcasters to base programming decisions on what they know best -- the needs and interests of the audience they serve. In deciding whether material is indecent, the broadcaster must be allowed to exercise its judgment as to whether a program will be "patently offensive" to the community which receives the program.

C. MERIT

Although it grudgingly acknowledges that "merit" is one of a "host of variables" relevant to determining whether material is indecent, the Commission has given no guidance as to how this term should be interpreted. For example, a complaint against a reading of James Joyce's *Ulysses* on Pacifica station WBAI was dismissed, not on grounds that the work was a literary classic, but on grounds that the broadcast occurred largely after midnight. See *Letter from Alex D. Felker, Chief, Mass Media Bureau to Thomas Byrne* (dated April 7, 1988).

The Commission's failure to explain how the merit of material militates against its "offensiveness" has forced broadcasters either to ban programs of merit or to air them in a "safe harbor period." Delaying the beginning of that

period until after midnight, as proposed in the NPRM, would effectively ban the material, since listenership after that hour is negligible.

The Commission's program-related policies should encourage, not deter, the production and broadcast of works of the highest quality. Commenters therefore urge the Commission to revise its definition of indecency to allow broadcasters the freedom to broadcast works of merit.

No work of merit is "patently offensive."

D. REASONABLE RISKS

Both the *Act I* and *Act II* courts have noted that the Commission has yet to articulate what standard it will apply in determining whether there is a "reasonable risk" that children will be exposed to indecent material. As the *Act I* court made clear that standard must include consideration of the definition of "children," the government's interest in assisting parents supervise their children's listening, and station- or program-specific audience data." 932 F.2d at 1510.

The NPRM does not solicit comment on these issues, nor attempt to justify the proposed ban in terms of the factors which the court has identified. As the Commenters have shown, however, neither "children" nor "radio listening" is a simple concept. How, and how much, "children" use different media varies enormously with the age of the child and the characteristics of the medium.

The Commission's theory is apparently that indecent programming must be outlawed whenever there is even a remote possibility that such programs can be heard by anyone under the age of 17 randomly tuning a radio or television set. This theory assumes that because radio and television are "pervasive" media, children of all ages are constantly tuned in and forever scanning the dial for any offensive reference to sex or excretion they can find.

This theory will not withstand scrutiny. As shown in the Statement of David Giovannoni, children use different media in different ways, and only gradually “grow into” radio. The Commission’s proposal to ban indecent radio programs until a late-evening hour is unnecessarily restrictive. The youngest children are not choosing radio programs even at a much earlier hour. The younger the child, the less likely he or she is to listen to radio at all.

Although teens begin to use radio actively, they listen much less than adults, and they do not listen randomly. Far from being mindless grazers, teens develop strong tastes for particular kinds of formats which they can integrate into their daily routines. Listening to public radio by teens is light. In fact, the level of teen listening to public radio at all hours is in the four percent range. As the *Act I* court found, the Commission has not explained why exposure to such a small portion of a given age group poses a “reasonable risk.” Nothing in the NPRM supplies such an explanation.

Based upon the holding of the *Act I* court and upon the evidence submitted as to children’s listening, the Commenters do not believe that public radio as a medium poses a reasonable risk to children.


CONCLUSION

The safe harbor proposed by the Commission does not define “children” with any particularity; nor consider the different ways in which children use radio and television, radio and pre-recorded audio, commercial and non-commercial radio. Absent a serious attempt to determine what constitutes a reasonable risk to children in light of these factors, and an effort to provide broadcasters and program producers with clearer, more reasonable definition of indecency, adoption of the indecency standard proposed in the NPRM would be unlawful. The Commenters therefore oppose adoption of the safe harbor

proposed and urge the Commission to reconsider and clarify its entire indecency policy.

Respectfully submitted,

Pacifica Foundation
National Federation of Community
Broadcasters,
American Public Radio,
Intercollegiate Broadcasting System,
National Association of College
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ATTACHMENT A

STATEMENT OF DAVID GIOVANNONI
REGARDING CHILDREN'S LISTENING TO PUBLIC RADIO

I. INTRODUCTION

This statement was prepared for submission to the Federal Communications Commission in response to its Notice of Proposed Rule Making (NPRM) in GC Docket No. 92-223. The NPRM invites comment on children's viewing and listening habits.

As described in the resume which appears as Attachment A to this statement, I head Audience Research Analysis, an independent firm specializing in radio audience research, particularly in the field of public broadcasting. The data summarized in this statement grew out of audience research which I conducted into the use of radio by children. The opinions expressed in this statement are my own.

II. QUESTIONS CONSIDERED

"Children love radio." "Children don't listen to radio." We don't know if children listen to radio." I set out to test the veracity of these commonly heard, but contradictory statements. These are the highlights of my findings:

1. The truth or falsity of these statements depends on the age of the children.
2. The youngest children do not use radio. Whatever exposure they might have is largely secondary in nature, with adults or older siblings controlling the selection of radio stations. Most do have control over pre-recorded audio and video media and television; these are the electronic media of choice for young children.
3. As children grow up they grow into radio. In some households parents may guide listening, even offering a "family listening" environment in which to hear select programs.
4. Self-directed (primary) radio listening begins between ages 6 and 11. The amount of radio used increases with the age of the child, and the

nature of this use changes also. Twelve year-olds average 15 hours of radio listening per week, most of which is at home (presumably under some parental supervision).

III. METHOD AND TERMINOLOGY

In order to test hypotheses about children's listening to radio, I found it necessary to define "children" with some precision. So long as the term "children" included persons aged 0-17, no hypotheses could be tested with any reasonable degree of accuracy since many in this broad age group did not use radio at all, and others used radio only slightly.

In order to determine when radio usage begins and how it develops, I first studied 12-to-17 year-old radio listening data gathered by Arbitron. Public radio estimates are reported from Arbitron's 1992 Nationwide, the summation of nearly 300,000 radio listening diaries gathered in the continental U.S. in April, May, and June of this year.

Arbitron defines "Teens" as persons between the ages of 12 and 17. But previous research and experience teach that radio use varies dramatically among the youngest and oldest teens. I established year-by-year listening patterns using a national sample of more than 150,000 diaries assembled in 1985 by Arbitron for its "Radio Today" and "Radio Year Round" publications. The reliability of these data are very high, as they are based on an effective sample size many times larger than the sample in any Arbitron market.

I turned to academic literature to assess radio use by children younger than 12 years of age. The primary studies upon which I relied are:

Christianson, P. (1992). Popular Music In Childhood: A Developmental Study (manuscript currently under review by Journal of Broadcasting and Electronic Media).

Christianson, P., Roberts, D. (1990). Popular Music In Early Adolescence. Washington DC.: Carnegie Council on Adolescent Development.

Christenson, P., DeBenedittis, P., and Lindlof, T. (1985). Children's Use of Audio Media. Communication Research, 12, 327-43.

Christenson, P., and Lindlof, T. (1983). The Role of Audio Media in the Lives of Children. Popular Music and Society, 9 (3), 25-40.

Lyle, J., and Hoffman, H. (1971). Children's Use of Television and Other Media. In Rubenstein, E., Comstock, G., & Murray, J. (Eds.), Television in Day-to-Day Life: Patterns of Use. Washington DC: Government Printing Office.

McKenna, L. (1992). Children and the Audio Medium: A Study of Children's Reactions to a Radio Program. University of Pennsylvania Doctoral Dissertation.

Media Perspectives (1990). Defining The Role of the Corporation for Public Broadcasting in Support of Children's Radio. Washington DC: Corporation for Public Broadcasting.

IV. RADIO USE IS MINIMAL AMONG YOUNG CHILDREN

At first, all exposure to audio is secondary -- the result of listening selections made by others. At an early age, many children gain access to audio programming on pre-recorded media, which account for the bulk of their audio exposure. As pre-teens gain access to radio, adults may help direct their listening by establishing family listening situations, particularly where children's radio programs are available.

All radio is audio, but not all audio is radio. Researchers into children's use of different sources of audio have discovered that young children listen to records and tapes that they own. (See Lyle and Hoffman; Christenson and DeBenedittis). These children use pre-recorded audio as a background sound to accompany other activities and to create domains of their own. Their use of pre-recorded media tends to increase as they develop an interest in popular music and select, and perhaps purchase, cassettes and CDs on their own.

Children who listened, or were asked to listen, to three radio shows targeted for children, were studied to ascertain how they used the programs. Studies of the three programs are in accord. See Media Perspectives, at pages 45-49. They show that children who listened to children's radio shows on public radio watched significantly less television than non-listeners and were more likely to read books for enjoyment -- just like their parents, who also listened to public radio. Children did not find the programs on their own. Parents learned about the shows while listening to the public station's regular programming. These parents then created a "family listening" environment in which they controlled the child's radio use.

As they develop, pre-teens begin to listen to radio formats of their own choosing. These formats are overwhelmingly music formats. A dissertation at the University of Pennsylvania found that children between the ages of 10 and

12 regarded popular music the most interesting segment of a children's radio program. See McKenna, 1992. Their interest was significantly dampened by jokes, instruction, introductions, and other talking elements. Similar results are reported by Christenson and DeBenedittis in their 1984 study.

V. CHILDREN GROW INTO RADIO

Radio usage increases with the age of the child. Twelve year olds listen to radio a little. Sixteen year olds listen more. Nineteen years olds listen even more. As shown in Graph 1 below, radio listenership increases during the teen years and approximately doubles between the ages of 12 and 18.

The place as well as the frequency of radio usage changes with age. As shown in Graph 1, the vast majority of pre-teen and teen listening occurs at home. Early teens listen to radio almost exclusively within the home. At-home listening peaks at 15 to 16 years of age. At 16, at-home listening gradually begins to decline, as listening in cars and at locations other side the home increases.

VI. TEENS ARE THE LIGHTEST RADIO USERS

Although radio listening increases with age, teens are by far the lightest radio users. As shown in Graph 2, radio listening increases dramatically after the teen age years and does appreciably decline for the remainder of the adult years. On average, persons 12-17 listen to one-third (32%) less radio than those 18-24 years old.

The low level of radio usage by teens is often attributed to their inability to listen while in school. However, as Graphs 3 and 4 demonstrate, radio usage actually declines when teens are out of school in summer months. Studies of hour-by-hour listening suggests that listening centers around school-related routines -- such as traveling to school, doing homework after school, and so forth. Like adults, teens incorporate radio into their daily routines. When these routines are removed from teens' schedules during the summer, the stimulus to use radio is reduced and radio listenership drops.

VII. PRE-TEEN AND TEENS CHOOSE THEIR MEDIA EXPERIENCES

Children's listening and viewing patterns are not random. As noted above, children in their early years largely ignore radio as medium and devote their attention to television and to pre-recorded forms of audio, such as cassettes and CDs. As radio usage increases, so does listener selectivity. Teens

are overwhelmingly attracted to radio stations which feature popular music formats. Reciprocally, of course, programmers target late teen audiences as the number and buying power of teen listeners increases.

VIII. PUBLIC RADIO APPEALS LESS TO TEENS THAN TO ANY OTHER AGE GROUP OF RADIO LISTENERS

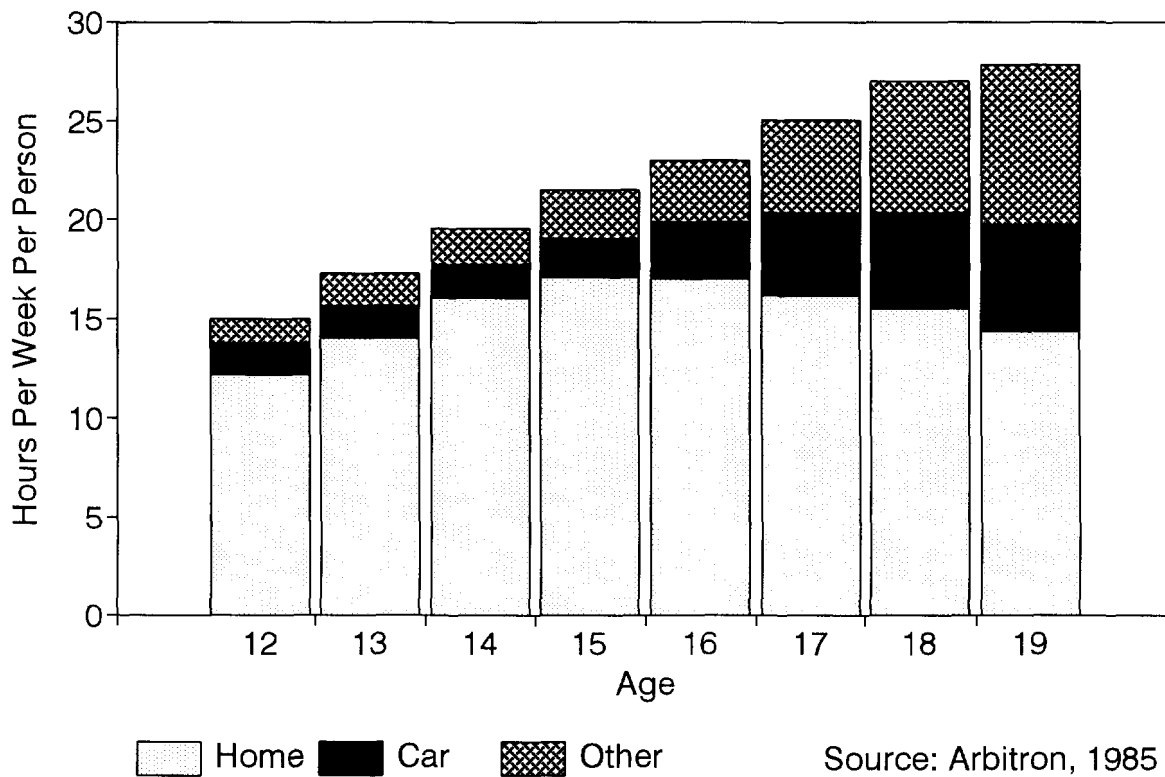
One correlary of the fact that teens are primarily attracted to popular music formats is that they are not strongly attracted to public radio. As shown in Graph 5, public radio attracts only approximately four to five percent of all teens, and only 1.9% of all listening (AQH). In addition, those few teens who listen, listen to small amounts of time. As Graph 5 illustrates, teens who listen to public radio listen only an average of 4 to 5 hours per week. By contrast, those 25 and older listen to more than 20 hours of radio a week, and more than 10 hours of public radio. Compare Graphs 2 and 5.

In sum, 96% of the teen population does not listen to measureable amounts of public radio, and the 4% who do listen to public radio devote less than 20% of their total radio listening to public radio.

David Giovannoni

GRAPH 1

Radio Use by Teens



GRAPH 2